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September 28, 2020

**Via ECF**

Honorable Edgardo Ramos  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Reyna Arroyo v. The Department of Education of the City of New York**  
**19-CV-7416 (ER)**

Dear Judge Ramos:

I am attorney also representing Plaintiff Arroyo in this matter. In accordance with this Court's Individual Motion Practice rules, Plaintiff is requesting a brief extension of time to submit her amended complaint from **September 30, 2020 to October 07, 2020**. I have been unable to reach opposing counsel. This is the second request for an extension by Plaintiff's attorney regarding submitting the amended complaint.

The reason for the extension is that Plaintiff's counsel had a confluence of deadlines including opposition papers in the matter of Hyacinthe v. City of New York, Index No. 151812/2020; conferences and depositions in the matter of Linda Williams v. Memorial Sloan-Kettering Cancer Center, Index No. 159216/2016 as well as reasonable accommodation letters on behalf of students and teachers in the New York City Department of Education and Southern Westchester BOCES during this time period and we have been recently retained in this matter (which was commenced *pro se*) on September 07, 2020. The time is needed to digest the file and to amend the complaint. As you may recall, The Court's decision dated August 06, 2020 allowed Plaintiff a leave to replead Plaintiff's First Amendment and retaliation claims, her Fourteenth Amendment equal protection claims on an arbitrator selection and discrimination on the basis of race and national origin, and her stigma plus claim based on her being on the "ineligible list".

Thus, it is respectfully submitted that the request for this brief extension of time is reasonable and thus would request the following schedule.

- a. Plaintiff's amended complaint due on October 07, 2020.**

Thank you for your consideration herein.

Very truly yours,

s/ Natalia Kapitonova  
NATALIA KAPITONOVA, ESQ.

CC: Alana Rachel Mildner, ACC via ECF